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Attorneys for Defendant  
CITY AND COUNTY OF SAN FRANCISCO

**UNITED STATES DISTRICT COURT**  
**NORTHERN DISTRICT OF CALIFORNIA**  
**OAKLAND DIVISION**

TAIRA DE BERNARDI, STEPHEN VAL  
KIRWAN, *et al.*,

Plaintiffs,

v.

CITY AND COUNTY OF SAN  
FRANCISCO,

Defendant.

ABDULLAH WAZWAZ, *et al.*,

Plaintiffs,

v.

CITY AND COUNTY OF SAN  
FRANCISCO,

Defendant.

Case No. 4:18-cv-04597-HSG

[*Consolidated for Pre-Trial Purposes with*  
*Case No.: 4:18-cv-05580-HSG*]

**STIPULATED JUDGMENT**

Hon. Haywood S. Gilliam, Jr.

1 The Parties, through their counsel, stipulate as follows:

- 2 1. That final judgment be entered in accordance with the Court's March 4, 2022 Order
- 3 granting the Parties' Joint Motions for Final Approval of Collective Action
- 4 Settlement ("Final Approval Motion").
- 5 2. That the settlement funds reflected in the Settlement Agreement and pursuant to the
- 6 Order granting the Final Approval Motion, be released to the Third Party
- 7 Administrator, BrownGreer, for disbursement to (1) all Plaintiffs who have signed
- 8 releases, in the amounts reflected in the Final Approval Motion and accompanying
- 9 declarations, (2) BrownGreer, for settlement administrator costs in the amount of
- 10 \$94,000, for fees incurred up to and including November 19, 2019, (3) Messing
- 11 Adam & Jasmine LLP, *De Bernardi* counsel, for attorneys' fees in the amount of
- 12 \$150,000, (4) Mastagni Holstedt, APC, *Wazwaz* counsel, for attorneys' fees in the
- 13 amount of \$65,000, (5) *De Bernardi* lead plaintiffs Taira De Bernardi and Stephen
- 14 Val Kirwan, for lead plaintiff incentive awards in the amount of \$1,250 each.
- 15 3. That Defendant pay BrownGreer, within 15 days of BrownGreer's submission to
- 16 Defendant of its final invoice, an additional sum for fees incurred and to be
- 17 incurred, since November 20, 2019, in connection with administering the
- 18 settlement and disbursing settlement proceeds.
- 19 4. That all "No Recovery Plaintiffs," and "Recovery Plaintiffs" who have not signed
- 20 releases, be dismissed without prejudice from the actions. These individuals are
- 21 listed in Exhibit A to this Stipulated Judgment.
- 22 5. That all "Recovery Plaintiffs" who signed releases and have settlement payments
- 23 made to them be dismissed with prejudice from the actions. These individuals are
- 24 listed in Exhibit B to this Stipulated Judgment.
- 25 6. That this Stipulated Judgment be implemented in accordance with the terms of the
- 26 Settlement Agreement and the Order granting the Final Approval Motion.
- 27
- 28

1 IT IS SO STIPULATED.

2 Dated: March 14, 2022

MESSING ADAM & JASMINE LLP

3  
4 By 

5 Gregg McLean Adam  
6 Wendi J. Berkowitz  
7 Attorneys for Plaintiffs  
8 TAIRA DE BERNARDI, STEPHEN VAL  
9 KIRWAN, et al.

10 Dated: March 14, 2022

MASTAGNI HOLSTEDT, APC

11 By 

12 DAVID E. MASTAGNI  
13 TAYLOR DAVIES-MAHAFFEY  
14 Attorneys for Plaintiffs  
15 ABDULLAH WAZWAZ, JASON MOORE,  
16 KENNETH YEUNG and BRIAN KAM, on behalf  
17 of themselves and all similarly situated individuals

18 Dated: March 14, 2022

OFFICE OF THE CITY ATTORNEY

19 By

20 DAVID CHIU, City Attorney  
21 JONATHAN C. ROLNICK, Chief Labor Attorney  
22 Attorneys for Defendant  
23 CITY AND COUNTY OF SAN FRANCISCO

24 Judgment is so entered in accord with the above.

25 Dated: March 15, 2022

26 

27 HAYWOOD S. GILLIAM, JR.  
28 UNITED STATES DISTRICT JUDGE

1 IT IS SO STIPULATED.

2 Dated: March 14, 2022

MESSING ADAM & JASMINE LLP

3  
4 By

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6 Gregg McLean Adam  
7 Wendi J. Berkowitz  
8 Attorneys for Plaintiffs  
9 TAIRA DE BERNARDI, STEPHEN VAL  
10 KIRWAN, et al.

11 Dated: March 14, 2022

MASTAGNI HOLSTEDT, APC

12 By

13 \_\_\_\_\_  
14 DAVID E. MASTAGNI  
15 TAYLOR DAVIES-MAHAFFEY  
16 Attorneys for Plaintiffs  
17 ABDULLAH WAZWAZ, JASON MOORE,  
18 KENNETH YEUNG and BRIAN KAM, on behalf  
19 of themselves and all similarly situated individuals

20 Dated: March 14, 2022

OFFICE OF THE CITY ATTORNEY

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23 DAVID CHIU, City Attorney  
24 JONATHAN C. ROLNICK, Chief Labor Attorney  
25 Attorneys for Defendant  
26 CITY AND COUNTY OF SAN FRANCISCO

27 Judgment is so entered in accord with the above.

28 Dated: March 15, 2022

\_\_\_\_\_  
HAYWOOD S. GILLIAM, JR.  
UNITED STATES DISTRICT JUDGE